

CRIMINAL COMPLAINT

United States District Court	DISTRICT of ARIZONA
United States of America v. Ryaine Keyoina Richardson DOB: 2001; US Citizen	DOCKET NO.
	MAGISTRATE'S CASE NO 19-07500MJ

Complaint for violation of Title 8 United States Codes §1324(a)(2)(B)(ii)

COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:

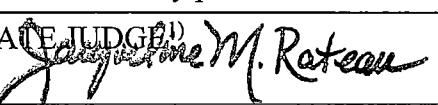
On or about July 22, 2019, at or near Douglas, in the District of Arizona, **Ryaine Keyoina Richardson**, named herein as the defendant or in reckless disregard of the fact that a certain alien, a six year old female, R. E. A.-H., DOB: 2013, had not received prior official authorization to come to, enter, or reside in the United States, did bring , or attempt to bring, to the United States said alien, in any manner whatsoever, regardless of any official action which may later be taken with respect to such alien, and did so for the purpose of private financial gain; in violation of **Title 8, United States Code, Section § 1324(a)(2)(B)(ii)**.

BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:

On July 22, 2019, **Ryaine Keyoina Richardson** applied to enter the United States at the Port of Entry in Douglas, Arizona, driving a silver 2009 Chevrolet Cobalt. Traveling with **Richardson** was a female child, approximately 6 years old. During primary inspection, **Richardson** orally declared themselves to be citizens of the United States and stated the child was her niece. **Richardson** was referred to secondary inspection for further examination of their immigration status. Once in secondary, it was determined that the back seat passenger, later identified as R. E. A.-H., DOB: 2013, did not have any documents allowing her to enter or be present in the United States.

Richardson was made aware of her *Miranda* Rights, which she waived. **Richardson** initially claimed she was not aware that R. E. A.-H. was an illegal alien. **Richardson** stated that she took the child to the border accompanied by an unknown male but before crossing into the United States, the unknown male exited the vehicle and told **Richardson** to tell Customs Officers that the girl was her niece and that she was a United States citizen. **Richardson** stated she was going to be paid \$500 – 600 to cross the child from Agua Prieta, Mexico to Douglas, Arizona. **Richardson** then stated she had a feeling the child was undocumented, but proceeded to apply for admission.

MATERIAL WITNESSES IN RELATION TO THE CHARGE:

Detention Requested Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.	SIGNATURE OF COMPLAINANT  OFFICIAL TITLE Border Patrol Agent CUSTOMS AND BORDER PROTECTION OFFICER
AUTHORIZED BY: AUSA RW/kj  Sworn to before me and subscribed in my presence.	
SIGNATURE OF MAGISTRATE/JUDGE 	DATE July 23, 2019

1) See Federal rules of Criminal Procedure Rules 3 and